

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

DYLAN GEERTS, ET AL. )  
PLAINTIFFS, ) NO. 3:17-1014  
v. )  
RUTHERFORD COUNTY, TENNESSEE, ) CRENshaw/ HOLMES  
DEFENDANT. )

**JOINT MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT AGREEMENT**

The plaintiffs Dylan Geerts, *et al.*, individually on behalf of themselves and on behalf of all members of the classes (“Plaintiffs”) and the defendant Rutherford County, Tennessee (“Defendant”) (collectively the “Parties”), all of whom are Parties to this litigation, through their respective undersigned counsel, jointly move pursuant to Rule 23 of the Federal Rules of Civil Procedure an applicable case law for an order (1) approving the proposed class action settlement agreement, (2) certifying the classes for settlement purposes, (3) appointing the named plaintiffs as class representatives, and (4) appointing Kyle Mothershead, Frank Brazil and Mark Downton as lead counsel for the classes. In support of this motion, the Parties have filed the Declaration of Mark Patton (doc. no. 241) and are submitting contemporaneously herewith a supporting memorandum. Further, as explained in the supporting memorandum, the Parties will file additional supporting filings on or before December 1, 2021.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 24, 2021, a copy of the foregoing Joint Motion for Final Approval was filed electronically. Notice of this filing was sent by operation of the Court's electronic filing system to each of the parties on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

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